

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff

v.

ASSORTED JEWELRY, ESTIMATED
VALUE: \$578,183.00 IN U.S. CURRENCY,

Defendants.

CIVIL NO. 19-

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, plaintiff, the United States of America, by and through its undersigned attorneys, Rosa Emilia Rodríguez-Vélez, United States Attorney for the District of Puerto Rico; Héctor E. Ramírez-Carbó, Assistant United States Attorney, Chief Civil Division, and Maritza González-Rivera, Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure.

NATURE OF THE ACTION

1. This is a civil action in rem brought to enforce the provisions of Title 21, United States Code, Sections 841(a)(1) and 881(a)(6) and Title 18, United States Code, Sections 1956(a)(1)(B)(i), (iii).

DEFENDANT IN REM

2. The defendant properties seized by an officer of the Drug Enforcement Administration (“DEA”) consist of Assorted Jewelry, estimated value: \$578,183.00 in U.S. currency. List of assorted jewelry is included herein as an attachment to the unsworn declaration of

the DEA, Special Agent, Derick Allen.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to Title 28 United States Code, Section 1345; over an action for forfeiture pursuant to Title 28, United States Code, Section 1355; and over this particular action pursuant to Title 21, United States Code, Sections 841(a)(1) and 881(a)(6) and Title 18, United States Code, Sections 1956(a)(1)(B)(i), (iii).
4. This Court has in rem jurisdiction over the defendant properties pursuant to Title 28, United States Code, Section 1355(b)(1)(A) (acts and omissions giving rise to the forfeiture occurred in this district) and Section 1355(b)(1)(B) (the defendant properties are found in this district).
5. Venue is proper in this district pursuant to Title 28, United States Code, Section 1355(b)(1)(A) (acts and omissions giving rise to the forfeiture occurred in this district) and Section 1395 (the defendant properties are found in this district).

BASIS FOR FORFEITURE

6. This is a civil action in rem brought to enforce the provisions of Title 21, United States Code, Sections 841(a)(1)(Unlawful acts and 881(a)(6)(All moneys, negotiable, instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this chapter), and Title 18, United States Code, Sections 1956(a)(1)(B)(i) (Laundering of monetary instruments).

FACTS

7. The facts and circumstances supporting the seizure and forfeiture of the defendant properties are contained in the Title 28, United States Code, Section 1746 unsworn declaration of the DEA, Special Agent, Derick Allen attached hereto, and incorporated herein as if fully stated.

CLAIM FOR RELIEF

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant properties be issued; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant properties condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 21th day of February, 2019.

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney

s/Héctor E. Ramírez-Carbó
Héctor E. Ramírez-Carbó
Assistant U.S. Attorney
Chief, Civil Division
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UNITED STATES ATTORNEY'S OFFICE
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San Juan, Puerto Rico 00918
Phone Number: (787)766-5656
Hector.E.Ramirez@usdoj.gov

s/M. González
Maritza González-Rivera
Assistant United States Attorney
USDC-PR No. 208801
UNITED STATES ATTORNEY'S OFFICE
Torre Chardón, Suite 1201
350 Carlos Chardón Street
San Juan, Puerto Rico 00918
Phone Number: (787) 766-5656
maritza.gonzalez@usdoj.gov

VERIFIED DECLARATION

I, Maritza González-Rivera, Assistant U.S. Attorney, for the District of Puerto Rico, declare under penalty of perjury as provided by Title 28, United States Code, Section 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Drug Enforcement Administration (“DEA”); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 21th day of February, 2019.

OS/M Gonzalez

Maritza González-Rivera
Assistant U.S. Attorney

VERIFIED DECLARATION

I, Derick Allen, Special Agent, DEA declare as provided by Title 28, United States Code, Section 1746, the following:

I have read the contents of the foregoing Complaint for Forfeiture in Rem and the attached unsworn declaration thereto, and I find the same to be true and correct to the best of my knowledge and belief. I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Juan, Puerto Rico, this 21 day of February, 2019.



Derick Allen, Special Agent
Drug Enforcement Administration (“DEA”)

UNSWORN DECLARATION IN SUPPORT OF FORFEITURE COMPLAINT

INTRODUCTION

Pursuant to Title 28, United States Code, Section 1746, I, Derick Allen, Special Agent, of the United States Department of Justice, Drug Enforcement Administration (DEA), I declare under penalty of perjury that the foregoing is true and correct:

PROFESSIONAL BACKGROUND

I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7). I am, therefore, an officer who is empowered to conduct criminal investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section, 2516.

I have been a Special Agent with the DEA for seven months. As a Special Agent, I have been sworn to enforce the laws of Title 21, United States Code, and related offenses under Title 18, United States Code. I have received sixteen weeks of training at the DEA Academy at Quantico, VA. I am currently assigned to the DEA Caribbean Division Enforcement Group 1 (E-1).

In my training and experience, I have learned that narcotics trafficking is a highly lucrative illegal activity. I have learned that the Dominican Republic has been identified as a source of supply for narcotics, including but not limited to cocaine. Through prior successful drug trafficking investigations conducted by DEA, it is revealed that the typical entry route for cocaine into Puerto Rico originates in Colombia, Venezuela,

Dominican Republic and Puerto Rico. Moreover, drug proceeds are also transported between these drug supply countries.

During my law enforcement career, I have received detailed instruction in and conducted various complex conspiratorial investigations concerning the unlawful importation and distribution of controlled substances; the laundering and concealment of drug proceeds; and the illegal use of communication facilities by drug traffickers in furtherance of their criminal activities.

This Unsworn Declaration is submitted in support of a Civil Forfeiture Complaint, for the forfeiture of Assorted Jewelry, Estimated Value: \$578,183.00. Therefore, I have not set forth each and every fact learned during the course of this investigation.

PROPERTY TO BE FORFEITED

ASSORTED JEWELRY, Estimated Value: \$578,183.00 (See Attachment).

BASIS FOR FACTS CONTAINED IN THIS UNSWORN DECLARATION

I make this unsworn declaration, on information and belief derived from oral and/or written reports and documents about this and other federal agents or officers of DEA:

1. On Tuesday November 13, 2018, Customs and Border Patrol (CBP) officers sent Jonathan Orlando ARCE-CARRILLO and his spouse Isadora NIEVES-CRUZ to secondary inspection at the Luis Munoz Marin International Airport. ARCE-CARRILLO and NIEVES-CRUZ were traveling from the Dominican Republic via Jet Blue Airlines. ARCE-CARRILLO had failed to declare jewelry as commercial merchandise coming from an international location in a US Port of Entry (POE),

which prompted the secondary inspection. Both ARCE-CARRILLO and NIEVES-CRUZ were given the opportunity to declare the merchandise. The jewelry was detected through standard inspections due to international travel. Agents had credible information suggesting ARCE-CARRILLO is a Source of Supply to various Drug Trafficking Organizations, to include the Manuel A Perez (MAP) Public Housing Project (PHP).


2. CBP officers downloaded data from two cellphones that ARCE-CARRILLO was traveling with upon his arrival to Puerto Rico from Dominican Republic. The data extraction shows drug trafficking and money laundering activities from ARCE-CARRILLO, to include a bulk money seizure from DEA Miami Office. Text messages were viewed from ARCE-CARRILLO's cellphone on drug negotiations, to include prices for kilos of cocaine and photo evidence of bulk amount of US currency.
3. When questioned about the ownership ARCE-CARRILLO claimed the jewelry was not his. This jewelry included 42 pieces of assorted items to include rings, necklaces, bracelets, watches, and more. List of assorted jewelry is included herein as an attachment to this unsworn declaration. Upon further conversation, ARCE-CARRILLO changed his version and stated he had a high precious metals business. ARCE-CARRILLO was not able to present any proof of legitimate jewelry business such as receipts, invoices, business cards or other documents regularly associated to that type of business. ARCE-CARRILLO said that he lends the jewelry to Urban, Reggaeton and Trap music artists for their musical videos

and performance.

4. A search of records performed at the Puerto Rico Department of Treasury revealed that ARCE-CARRILLO does not have legitimate income and does not file any income taxes in the commonwealth of Puerto Rico.
5. ARCE-CARRILLO could not provide a reasonable explanation for not declaring the jewelry as merchandise seeking entry to the US. At that moment, CPB Officers proceed to retain the jewelry from ARCE-CARRILLO as failure to declare merchandise.
6. Subsequently, DEA agents seized the jewelry from CBP and it was marked as DEA evidence. Based on my training and experience, the inconsistent statements of ARCE-CARRILLO and his lack of legal income I understand that the jewelry is forfeitable as proceeds of money laundering and narcotics violations.

Based upon my training and experience, participation in other investigations, and facts concerning this investigation, I believe that property Assorted Jewelry, Estimated Value: \$578,183.00 is forfeitable as property involved in or used in furtherance of a violation of a Federal Law or proceeds of a drug trafficking offense, pursuant to Title 21, United States Code, Sections 841(a)(1) , 881(a)(6) and money laundering transaction, as per Title 18, United States Code, Sections 1956 (a) (1) (B)(i), (iii).

Sworn and signed under penalty of perjury, pursuant to Title 28, United States
Code, Section 1746, in San Juan, Puerto Rico this 21 of February, 2019.



Derick Allen, Special Agent
Drug Enforcement Administration

Attachment

Assorted Jewelry Estimated Value: \$578,183.00 in U.S. currency to be forfeited

No.	Description of Property	Serial Number	Item Value
1	1 Rolex Yacht-Master II	7J53Z256	\$25,150.00
2	1 Rolex President 18 karat yellow gold	W377470	\$27,750.00
3	1 Rolex Yacht-Master	D357M651	\$29,950.00
4	1 Audemars Piguet Stainless Steel Royal Oak 100% Genuine	0994 / J02300	\$85,000.00
5	1 Fancy round diamonds cut design link chain necklace	N/A	\$852.00
6	1 Fancy round diamonds cut design link chain necklace	N/A	\$2,340.00
7	1 Fancy round diamonds cut design link chain bracelet	N/A	\$1,188.00
8	1 Rolex Motif Black Enamel Rotary Watch Bezel & Gold Bangle	N/A	\$3,604.00
9	1 Diamonds Tennis Bracelet contains a 41 brilliant shape natural diamonds in pron settings	N/A	\$12,814.00
10	1 Cross pendant contains a 16 brilliant shape naturals diamonds	N/A	\$6,304.00
11	1 Star pendant contains a 35 brilliant shape naturals diamonds	N/A	\$4,576.00
12	1 Cross pendant contains a 83 brilliant shape naturals diamonds	N/A	\$2,914.00
13	1 Diamonds Tennis Necklace contains a 126 brilliant shape natural diamonds in pron settings	N/A	\$22,929.00
14	1 Diamonds Tennis Necklace contains a 135 brilliant shape natural diamonds	N/A	\$58,896.00
15	1 Diamonds Tennis Necklace contains a 148 brilliant shape natural diamonds - Broken	N/A	\$9,912.00
16	1 Diamonds Tennis Necklace contains a 149 brilliant shape natural diamonds in pron settings	N/A	\$19,832.00
17	1 Curb link bracelet in 14 karat yellow solid gold	N/A	\$20,690.00
18	1 Diamonds Fancy Prons-Bar Designs Bracelet	N/A	\$26,598.00
19	1 Diamonds Fancy Prons-Bar Designs Necklace	N/A	\$59,467.00
20	1 Custom Logo Audemars Piaget pendant	N/A	\$12,464.00
21	1 Emeralds Shape designs pendant	N/A	\$5,663.00
22	1 Custom sentence pendant in Spanish REAL HASTA LA MUERTE	N/A	\$8,000.00
23	1 Custom word SUMMER with butterfly in top with details in red color enamel finish in pendant	N/A	\$16,228.00
24	1 Hand crafted beautiful "Juste un Clou" nail motif bangle bracelet Cartier clone reproduction	N/A	\$8,556.00

Attachment

Assorted Jewelry Estimated Value: \$578,183.00 in U.S. currency to be forfeited

25	2 Love bracelet	CRD261076	\$40,100.00
26	1 Love bracelet	DSM912	\$24,500.00
27	1 Pendant of Plano Studio no gold metal	N/A	\$10.00
28	1 Cubic Zirconia of 4.5mm, Tennis Necklace	N/A	\$956.00
29	1 Cubic Zirconia of 3.0 mm, Tennis Necklace	N/A	\$125.00
30	1 Stud Pair of earrings diamonds simulant	N/A	\$5.00
31	1 Solitary lady s Cubic Zirconia ring with a cluster Cubic Zirconia	N/A	\$50.00
32	1 Necklace mounting of four prongs basket settings	N/A	\$2,640.00
33	1 Eternity ring band contains 160 brilliant cut natural diamonds	N/A	\$14,368.00
34	1 Fancy Ring Detailed Engagement Rings Outstanding Hiphop Full Diamond Rings for Men	N/A	\$13,508.00
35	1 Fancy Star Ring Detailed Engagement Full Diamond Rings	N/A	\$8,246.00
36	1 Fantasy eternity ring, mounted in white metals and Brilliant shape Cubic Zirconia	N/A	\$25.00
37	1 Gold 14 karat yellow frame with brilliant shape natural diamonds for teeth cover	N/A	\$462.00
38	1 Replica of Louis Vuitton Monogram Black Magnetic bracelet	N/A	\$10.00
39	1 Black/grey soft GG Supreme Style, crafted from a coated microfiber fabric	N/A	\$750.00
40	1 Versace Sunglasses VE 2187 1252/87 Pale Gold / Gray	N/A	\$295.00
41	1 Eternity ring with Roman Numerals with two row with	N/A	\$426.00
42	1 Eternity ring with three row with full brilliant shape	N/A	\$30.00

JS 44 (Rev. 11/04)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Maritza González-Rivera, AUSA, 350 Carlos Chardón Ave, Suite 1201, Hato Rey, PR 00918

DEFENDANTS

ASSORTED JEWELRY, ESTIMATED VALUE:
\$578,183.00 IN U.S. CURRENCY,

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title 21, United States Code, Sections 841(a)(1) and 881(a)(6) and Title 18, United States Code, Sections 1956(a)(1)(B)(i), (iii).

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

S/Maritza González-Rivera

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFF _____ JUDGE _____ MAG. JUDGE _____


United States District Court *for the* District of Puerto Rico
CATEGORY SHEET

1. Title of Case (Name of first party on each side only)

US v. ASSORTED JEWELRY, ESTIMATED VALUE: \$578,183.00 IN U.S.
CURRENCY,

2. Category in which case belongs: (See Local Rules)

☒

ORDINARY CIVIL CASE
SOCIAL SECURITY
BANK CASE
INJUNCTION

CIVIL FORFEITURE

3. Title and number, if any, of related cases (See Local Rules)

4. Has a prior action between the same parties and based on the same claim ever been filed in this Court?

☐ YES

☒

NO

5. Is this case required to be heard and determined by a District Court of three judges pursuant to Rule 28 U.S.C. 2284?

☐ YES

☒

NO

6. Does this case question the constitutionality of a state statute (FRCP 24)?

☐ YES

☒

NO

(Please Print)

USDC ATTORNEY'S ID NO.

208801

ATTORNEY'S NAME:

MARITZA GONZALEZ RIVERA

MAILING ADDRESS:

TORRE CHARDON, SUITE 1201, 350 CARLOS CHARDON AVE

HATO REY PR

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